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November 14, 2017

VIA ECF and FAX

Hon. Robert W. Sweet
United States District Judge
Daniel Patrick Moynihan
United States Courthouse, Courtroom 18C
500 Pearl St.
New York, NY 10007-1312
Fax No. 212-805-7925

Re: *WowWee Group Limited, WowWee Canada, Inc., and WowWee USA, Inc. v. Aaiwa Electronic Technology Co., Ltd.*
Case No. 1:17-cv-7969 (RWS)
Request to Extend Plaintiffs' Time to Oppose

Dear Judge Sweet,

We represent Plaintiffs, WowWee Group Limited, WowWee Canada, Inc. and WowWee USA, Inc. (“Plaintiffs” or “WowWee”) in the above-referenced action (the “Action”). On October 17, 2017, the Court entered: 1) Temporary Restraining Order, 2) Order to Show Cause Why a Preliminary Injunction Should Not Issue, 3) Asset Restraining Order, 4) Order Authorizing Service by Electronic Means and 5) Order Authorizing Expedited Discovery (“October 17, 2017 Order”). As per the terms of the October 17, 2017 Order, the Order to Show Cause Hearing was scheduled for October 25, 2017, Defendants’ opposing papers were due on or before October 23, 2017 and Plaintiffs’ reply papers were due on or before October 24, 2017. On October 18, 2017, the Court So-Ordered Plaintiffs request that the Order to Show Cause Hearing be adjourned until November 1, 2017.

On November 1, 2017, Plaintiffs appeared before the Court for the Order to Show Cause Hearing. On the same day, November 1, 2017, the Court entered an Order Extending the Temporary Restraining Order and Adjourning the Order to Show Cause Hearing (“November 1, 2017 Order”). As per the November 1, 2017 Order, the Order to Show Cause Hearing was adjourned until November 15, 2017 at 11:00 a.m. Moreover, the November 1, 2017 Order required opposition papers to be filed on or before November 13, 2017 and reply papers to be filed on or before November 14, 2017.

After close of business on the evening of November 13, 2017, Defendant Ebuy360 Outlet Store, Defendant Shenzhen Bolt Innovation Technology Co., Ltd., Defendant Shenzhen Listing Technology Co., Ltd., Defendant Shop2949193 Store, Defendant Bustriend Store, Defendant TUMI Official Store/TUMIpetlife and Defendant Anthony’s International Trade (collectively, “Moving Defendants”) moved under F.R.C.P. 12(b)(5) and filed a Cross Motion to Dismiss Plaintiffs’ Complaint and Order to Show Cause and Opposition to Plaintiff’s Order to Show Cause (“Moving Defendants’ Motion”).

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Not only did Moving Defendants oppose Plaintiffs' Order to Show Cause, they went one step further and cross-moved pursuant to F.R.C.P. 12(b)(5) to dismiss Plaintiffs' Complaint. It is axiomatic that less than two days to oppose a dispositive motion to dismiss is inadequate. *See* Local Civil Rule 6.1.

Therefore, Plaintiffs respectfully request that the Court extend Plaintiffs' time to respond to Moving Defendants' Motion until November 28, 2017.

We thank you for your time and attention to this matter.

Respectfully submitted,

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